

REC'D TN
REGULATORY AUTH.

IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

'00 SEP 20 AM 9 57

IN RE: PETITION OF BELL SOUTH)
TO IMPLEMENT NEW AND)
INCREASE EXISTING LATE)
PAYMENT CHARGES)

OFFICE OF THE
EXECUTIVE SECRETARY
DOCKET NO. 00-00041

MOTION FOR EXTENSION OF TIME TO ARGUE BEFORE THE TRA

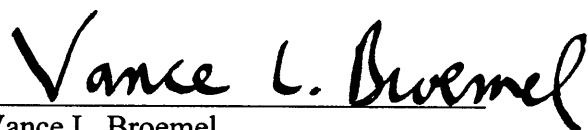
Comes the Consumer Advocate Division of the Office of Attorney General and hereby moves for an extension of time to argue the matters set for the Conference Agenda for September 26, 2000 in the "Late Payment" docket. For cause the Consumer Advocate Division would show that the counsel on this case, Vincent Williams, is currently on jury duty in the courts for Metropolitan Nashville/Davidson County, Tennessee and is expected to serve on a case that is anticipated to last through the week of September 25-29, 2000.

The other attorney for the Consumer Advocate Division, Vance Broemel, is not familiar with the numerous pleadings in this case. This matter has appeared on several previous Conference Agendas and Mr. Williams was counsel on behalf of the Consumer Advocate Division at those Conferences. Arguments for the Conference of September 26, 2000 are anticipated to involve statements made and positions taken at these previous Conferences. In addition, Mr. Williams has told Mr. Broemel that he intends to file another brief in response to BellSouth's latest filing but has not had time to complete it because of the jury duty in the case which began on Monday September 18, 2000.

POSTED
9-20-00

Wherefore Tennessee consumers pray that the request for extension of time until the next regularly scheduled conference be granted.

Respectfully submitted,



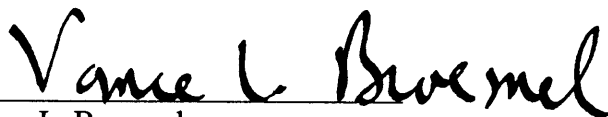
Vance L. Broemel
Assistant Attorney General
Consumer Advocate Division
425 5th Avenue, North
Nashville, TN 37243
(615) 741-8723
BPR. No. 011421

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Document has been faxed and mailed postage prepaid to the parties listed below this 20th day of September, 2000.

Guy Hicks, Esq.
Patrick Turner, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

David Waddell, Esq.
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505



Vance L. Broemel

IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

IN RE: PETITION OF BELL SOUTH)
TO IMPLEMENT NEW AND) DOCKET NO. 00-00041
INCREASE EXISTING LATE)
PAYMENT CHARGES)

AFFIDAVIT IN SUPPORT OF MOTION FOR EXTENSION OF TIME TO ARGUE
BEFORE THE TRA

Comes now, Vance Broemel, upon personal knowledge, having been
duly sworn and attests to the following:

1. The counsel on this case, Vincent Williams, is currently on jury duty in the courts for Metropolitan Nashville/Davidson County, Tennessee and is expected to serve on a case that is anticipated to last through the week of September 25-29, 2000.
2. The other attorney for the Consumer Advocate Division, Vance Broemel, is not familiar with the numerous pleadings in this case. This matter has appeared on several previous Conference Agendas and Mr. Williams was counsel on behalf of the Consumer Advocate Division at those Conferences. Arguments for the Conference of September 26, 2000 are anticipated to involve statements made and positions taken at these previous Conferences.
3. In addition, Mr. Williams has told Mr. Broemel that he intends to file another brief in response to BellSouth's latest filing but has not had time to complete it

4. Wherefore Tennessee consumers pray that the request for extension of time until the next regularly scheduled conference be granted.

Sworn to and subscribed before me

this 20th day of September, 2000

Teresa R. Harris
NOTARY PUBLIC

My commission expires on: January 25, 2003

Certificate of Service

I hereby certify that a true and correct copy of the foregoing document has been faxed and mailed postage prepaid to the parties listed below this 20th day of September, 2000.

Guy Hicks, Esq.
Patrick Turner, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

David Waddell, Esq.
Executive Secretary
Tennessee Regulatory Authority
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Vance L. Broemel
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